

## EXHIBIT 59

# MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

## Message

**From:** Sam Heft-Luthy [heftluthy [REDACTED]]  
**Sent:** 10/14/2020 9:20:01 PM  
**To:** privacysurfaces-team [privacy-surfaces-team [REDACTED]]; Jonathan McPhie [jmcphie [REDACTED]]  
**Subject:** Fwd: Program Review: Privacy Surfaces

Deck and notes from today's review. Highlights:

- Some good discussion on better metrics, which point to two "philosophies of success" in privacy (I think both of which are important):
  - **User trust and affect** - giving users a *sense* of the system as working to their benefit. Important but gameable without actually improving any of the underlying conditions, remains our higher-level goal
  - **Concrete risk models being addressed** - users reckon with tradeoffs and are in a position of self-determination w.r.t. how their data is shared. More tangible, but more difficult in Privacy than Security because of our tangled consent approach
- Rahul called out a concern that we're stretching ourselves thin, especially given that we are doing a lot to get users to understand a system that is just fundamentally difficult to get (WAA, GAP, etc.). He argues that we should prioritize **landing our short-term commitments for N3 consent, any long-term work to reimagine consent, and efforts like Reassure**. Greg mentioned that having the right channels in place when that reimagination comes is still vital, but Rahul also said that given, say, PAA, that reimagination may not be too far off!
- Good talk on executing on PA partnerships - in general, a tension between carrot and the stick. Is privacy a tax, which means PDPO needs to be more aligned in wielding a big stick, or is it a benefit to PA goals, which means PDPO needs to be more responsive to PA needs. Probably both, but for us to think through as we work with Jonathan McPhie on our approach

----- Forwarded message -----

**From:** Sam Heft-Luthy <heftluthy [REDACTED]>  
**Date:** Wed, Oct 14, 2020 at 1:30 PM  
**Subject:** Program Review: Privacy Surfaces  
**To:** Rahul Roy-Chowdhury <rahulr [REDACTED]>, Sarah Hammond <shammond [REDACTED]>, Jonathan McPhie <jmcphie [REDACTED]>, Daniele Souza <danielesouza [REDACTED]>, Stephan Micklitz <micklitz [REDACTED]>, Bénigne Deprey <benigne [REDACTED]>, Wei Tu <weitu [REDACTED]>, Mimi Underwood <munderwood [REDACTED]>, Othar Hansson <othar [REDACTED]>, Mark Risher <risher [REDACTED]>, Annie Klemp <annicklemp [REDACTED]>, Meagan Pi <meagan [REDACTED]>, Reza Behforooz <reza [REDACTED]>, <ggelke [REDACTED]>, Jeffrey Korn <jlk [REDACTED]>, Greg Fair <gregfair [REDACTED]>, Scott Dougall <dougall [REDACTED]>, Angela Alvarez <angelaalvarez [REDACTED]>, <justchen [REDACTED]>, Camie Hackson <camie [REDACTED]>, Micha Segeritz <mseg [REDACTED]>, Willa Chalmers <willa [REDACTED]>, Joshy Joseph <joshy [REDACTED]>, Anne Schaefer <aschaefer [REDACTED]>, <talherman [REDACTED]>, Claire Herrin <cherrin [REDACTED]>, Eduardo Tejada <etejada [REDACTED]>, Sam Heft-Luthy <heftluthy [REDACTED]>

Thank you all for coming to today's review.

Here is the deck we ran through:

[https://docs.google.com/presentation/d/1JzBPuzC3RgoGDd1YzjwD0mM2aI5h7dQrJpCvWq3LhnY/edit#slide=id.g285cae3f80\\_2\\_1](https://docs.google.com/presentation/d/1JzBPuzC3RgoGDd1YzjwD0mM2aI5h7dQrJpCvWq3LhnY/edit#slide=id.g285cae3f80_2_1)

And here are the notes (thanks Jonathan!):

[https://docs.google.com/document/d/1LWXmOOUGdHZ1l2J2ffHevK9NrpskF\\_mdurFm52ePVM8/edit?ts=5f874ac0](https://docs.google.com/document/d/1LWXmOOUGdHZ1l2J2ffHevK9NrpskF_mdurFm52ePVM8/edit?ts=5f874ac0)

## Program Review: Privacy Surface

Wed Oct 14, 2020 11am – 12pm

SVL-CRSM1265-5-Hunter2 (3) [GVC, Phone] ([map](#))

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### More phone numbers

- Daniele Souza
- Rahul Roy-Chowdhury
- Reza Behforooz
- Greg Fair
- Jonathan McPhie
- Sam Heft-Luthy
- Micha Segeritz
- [ggelke](#) [REDACTED]
- [justchen](#) [REDACTED]
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- Bénigne Deprey
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- Stephan Micklitz
- Wei Tu
- Mark Risher
- Claire Herrin
- Meagan Pi
- Camie Hackson
- Jeffrey Korn
- Othar Hansson
- Annie Klemp

**Topic Owners: Othar**

Program Reviews are pre-determined and are aligned thematically to Core's four themes: Helpful, Trust, Excellence and Efficiency. Program Reviews will occur monthly and depending on the theme, your program review may occur 3 or 4 times a year. [go/userpdpo-reviewguide](#)